

EXHIBIT 10

**NOTICE OF REJECTION OF EXECUTORY CONTRACTS AND UNEXPIRED
LEASES**

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

EAST BROADWAY MALL,

Case No. 19-12280 -DSJ

Debtor.

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**NOTICE REGARDING EXECUTORY CONTRACTS AND UNEXPIRED LEASES TO
BE REJECTED PURSUANT TO THE PLAN**

PLEASE TAKE NOTICE THAT on [●], 2023, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) entered an order (the “**Disclosure Statement Order**”), (a) authorizing Bank of Hope f/k/a BBCN Bank (“**Bank of Hope**” or “**Bank**”), secured creditor for the chapter 11 estate (the “**Estate**”) of the above-captioned debtor, East Broadway Mall (“**Debtor**” or “**EBM**”) to solicit acceptances for the *Chapter 11 Plan of Liquidation* (as may be modified, amended, or supplemented from time to time, the “**Plan**”);¹⁴ (b) approving the *Disclosure Statement for the Chapter 11 Plan of Liquidation* (the “**Disclosure Statement**”) as containing “adequate information” pursuant to section 1125 of the Bankruptcy Code; (c) approving the solicitation materials and documents to be included in the solicitation packages (the “**Solicitation Packages**”); and (d) approving procedures for soliciting, receiving, and tabulating votes on the Plan and for filing objections to the Plan.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Article V. of the Plan each of the Debtor’s Executory Contracts and Unexpired Leases not previously assumed or rejected will be deemed rejected as of the Effective Date, other than: (1) those that are identified on the Schedule of Assumed Executory Contracts and Unexpired Leases; (2) those that have been previously assumed by a Final Order; (3) those that are the subject of a motion to assume that is pending on the Confirmation Date; (4) those that are a contract, release, or other agreement or document entered into in connection with the Plan; or (5) those that are an insurance policy. The Schedule of Assumed Executory Contracts and Unexpired Leases is subject to ongoing review and revision.

PLEASE TAKE FURTHER NOTICE THAT you are receiving this Notice because the Debtors’ records reflect that you are a party to an Executory Contract or Unexpired Lease that will be rejected pursuant to the Plan. Therefore, you are advised to review carefully the information contained in this Notice and the related provisions of the Plan.

PLEASE TAKE FURTHER NOTICE THAT the hearing at which the Court will consider Confirmation of the Plan (the “**Plan Confirmation Hearing**”) will commence on March

¹⁴ Capitalized terms not otherwise defined herein shall have the same meanings set forth in the Disclosure Statement.

1, 2023 at 10:00 a.m. prevailing Eastern Time, before the Honorable David S. Jones, in the United States Bankruptcy Court for the Southern District of New York, located at One Bowling Green New York, NY 10004.

PLEASE TAKE FURTHER NOTICE THAT all proofs of Claim with respect to Claims arising from the rejection of Executory Contracts or Unexpired Leases, if any, must be filed with the Bankruptcy Court within 30 days after the date of service of the order of the Bankruptcy Court (including the Confirmation Order) approving such rejection. Any Claims arising from the rejection of an Executory Contract or Unexpired Lease not filed within such time will be automatically disallowed, forever barred from assertion, and shall not be enforceable against the Estate or the New Tenant, or their property without the need for any objection by the New Tenant or further notice to, or action, order, or approval of the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE THAT the deadline for filing objections to the Plan is **February 22, 2023, at 4:00 p.m.** prevailing Eastern Time (the “**Plan Objection Deadline**”). Any objection to the Plan must: (a) be in writing; (b) conform to the Bankruptcy Rules, the Local Rules, and any orders of the Court; (c) state, with particularity, the basis and nature of any objection to the Plan and, if practicable, a proposed modification to the Plan that would resolve such objection; and (d) be filed with the Court (contemporaneously with a proof of service) and served upon the following parties so as to be actually received on or before **February 22, 2023, at 4:00 p.m.** prevailing Eastern Time:

WINDELS MARX LANE & MITTENDORF LLP Counsel to the Bank of Hope James M. Sullivan 156 West 56th Street New York, New York 10019 (212) 237-1170	SFERRAZZA & KEENAN PLLC Counsel to the Debtor and Debtor In Possession Sarah M. Keenan 532 Broadhollow Road, Suite 111 Melville, New York 11747 (631) 753-4400 ext. 23
SYLVIA O. HINDS-RADIX Corporation Counsel of the City of New York Zachary B. Kass Senior Counsel 100 Church Street New York, New York 10007 (212) 356-2113	Office of the United States Trustee Southern District of New York U.S. Federal Office Building 201 Varick Street, Suite 1006 New York, NY 10014
LAW OFFICE OF RACHEL S. BLUMENFELD PLLC Counsel to Grace Chan Rachel S. Blumenfeld 26 Court Street, Suite 2220	

Brooklyn, New York 11242 (718)858-9600	
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PLEASE TAKE FURTHER NOTICE THAT any objections to Plan in connection with the rejection of the Executory Contract(s) and Unexpired Lease(s) identified above and/or related rejection damages proposed in connection with the Plan that remain unresolved as of the Plan Confirmation Hearing will be heard at the Confirmation Hearing (or such other date as fixed by the Court).

PLEASE TAKE FURTHER NOTICE THAT if you would like to obtain a copy of the Disclosure Statement, the Plan, the Plan Supplement, or related documents, you should contact Windels Marx Lane & Mittendorf, LLP, the voting and claims agent retained by the Bank in the Chapter 11 Case (the “**Voting and Claims Agent**”), by: (i) writing Windels Marx Lane & Mittendorf, LLP Re: East Broadway Mall, 156 West 56th Street, New York, NY 10019; or (ii) via electronic mail to JSullivan@Windelsmarx.com. You may also obtain copies of any pleadings filed in the Chapter 11 Case for a fee via PACER at: <http://www.nysb.uscourts.gov>.

Dated: [●], 2023
New York, New York

/s/ DRAFT

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